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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

SHELDON LOCKETT; MICHELLE
DAVIS; and CLYDE DAVIS,

Plaintiffs,

v.

COUNTY OF LOS ANGELES, a
public entity; LOS ANGELES
COUNTY SHERIFF'S
DEPARTMENT, a law enforcement
agency; SHERIFF JIM
McDONNELL; MIZRAIN ORREGO,
a Deputy Los Angeles County Sheriff;
SAMUEL ALDAMA, a Deputy Los
Angeles County Sheriff; and DOES 1
through 100, inclusive.,

Defendants.

Case No.: 2:18-cv-05838-DSF (JPRx)
Assigned to the Hon. Dale S. Fischer

PLAINTIFF'S FIFTH
SUPPLEMENTAL DISCLOSURES
PURSUANT TO FEDERAL RULE
OF CIVIL PROCEDURE 26(a)(1)

1 Plaintiff hereby makes the following fifth supplemental disclosures pursuant
2 to Federal Rule of Civil Procedure 26(a)(1):

3 PRELIMINARY STATEMENT

4 These disclosures are made solely for the purpose of this action and each
5 disclosure is subject to all appropriate objections. All objections as to competency,
6 relevance, materiality, admissibility, and any and all other objections that would
7 require the exclusion of any witnesses or documents identified herein. Such
8 objections are reserved and may be interposed at the time of trial.

9 It should be noted that this disclosing party has not yet completed
10 investigation of the facts relating to this action, has not fully completed discovery in
11 this action, and has not completed preparation for trial of this action. All of the
12 disclosures contained herein are based only upon such information and documents
13 as are presently available and disclose only those contentions which presently occur
14 to this disclosing party.

15 Consequently, in that investigation and discovery continue, these disclosures
16 are given without prejudice to the rights of the disclosing party, and plaintiffs
17 reserve the right to change any and/or all disclosures herein as additional facts are
18 ascertained, analyses are made, legal research is completed, and contentions are
19 made. In addition, plaintiffs reserve the right to produce at the time of trial any and
20 all subsequently discovered evidence relating to the proof of presently known
21 material facts, and to produce all evidence, whether discovered, relating to the proof
22 of subsequently discovered facts. The disclosures contained herein are made in a
23 good faith effort to supply factual information and as much specification of legal
24 contention as is presently known.

25 Except for explicit facts admitted herein, no admissions of any nature
26 whatsoever are implied or should be inferred. The fact that the disclosure herein has
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1 been provided should not be taken as an admission or acceptance of the existence of
2 any fact or facts, or that such disclosure constitutes admissible evidence.

3 The foregoing is, by this reference, incorporated into each and every one of
4 the following disclosures.

5 **SUPPLEMENTAL LIST OF DOCUMENTS**

6 In addition to the previously designated documents, Plaintiff, subject to and
7 without waiving the foregoing objections, identifies the following additional
8 exhibits not yet identified at depositions are marked as follows:

9 206 Gonzalez v County of LA – complaint

10 207 Waldie v County of LA – First Amended Complaint

11 208 Guzman claim for damages

12 209 Banuelos claim for damages

13 Copies of these documents are served as attachments to the email service of
14 this document.

15 Plaintiff is informed and believes and thereon states that there are substantial
16 additional exhibits anticipated to be identified at depositions; this list of exhibits will
17 be supplemented as additional exhibits are identified.

18 **SUPPLEMENTAL LIST OF WITNESSES**

19 Plaintiff identifies the following individuals pursuant to F.R.C.P. 26(a)(1)(A).
20 This identification is based on plaintiff's broad interpretation for disclosure and does
21 not imply plaintiff's belief that these individuals have discoverable information
22 relevant to the disputed facts. Based on such broad interpretation, the following are
23 the names, addresses and telephone numbers of individuals who likely have
24 discoverable information that the disclosing party may use to support his claims or
25 defenses identifying the subjects of the information. Plaintiff will supplement the list
26 of witnesses, and subject of their testimony, to the extent required by F.R.C.P.
27 26(a)(1)(A).
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1 **A. PERCIPIENT WITNESSES**

2 In addition to the previously identified witnesses, plaintiff identifies the
3 following employees of the Los Angeles County Sheriff's Department who may be
4 contacted c/o Ivie, McNeill & Wyatt, 444 S. Flower St., 18th Floor, Los Angeles,
5 CA 90071 and/or thought their attorney of record Alan Romero, ROMERO LAW,
6 APC, 80 S. Lake Avenue, Suite 880, Pasadena, CA 91101-2672. Garrido

7 77. Javier Guzman, Jr Deputy Guzman is anticipated to testify about those
8 matters as set forth in his claim for damages as well as all items set for the below for
9 Lt. Garrido.

10 78. Lt. Garrido: Lt. Garrido is anticipated to testify about all issues relating to
11 the Executioners and the Compton station, including but not limited to the
12 following:

- 13 • Deputies who are members of the Executioners
- 14 • Deputies who are prospects to become members of the executioners
- 15 • Actions taken by the inked members of the Executioners
- 16 • Actions taken by prospects to become members of the Executioners
- 17 • The knowledge of superiors and ranking members within the Sheriff's
- 18 Department as to the Executioners
- 19 • The "ghost gun" process
- 20 • How a member becomes "inked"
- 21 • How a prospect "chases ink"
- 22 • How a prospect "chases ink"
- 23 • How the Executioners were running the Compton station
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1 Plaintiff is currently investigating the names of additional individuals who
2 may possess discoverable information concerning this case. Plaintiff reserves the
3 right to supplement and/or modify the above list of individuals as the discovery in
4 this case is ongoing and investigation continues.

5 DATED: October 1, 2020

THE SWEENEY FIRM

6 and
7

8 GLICKMAN & GLICKMAN,
9 A LAW CORPORATION

10 By /s/ Steven C. Glickman

11 John E. Sweeney

12 Steven C. Glickman

13 Attorneys for Plaintiff

14 SHELDON LOCKETT
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PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 9460 Wilshire Boulevard, Suite 330, Beverly Hills, California 90212.

On **October 1, 2020**, I served the foregoing documents described as:
**PLAINTIFF'S FIFTH SUPPLEMENTAL DISCLOSURES PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1)** on the interested parties in
this action:

SEE ATTACHED SERVICE LIST

[xx] BY E-MAIL OR ELECTRONIC SERVICE: I caused a copy of the document(s) to be sent from e-mail address lupe.gallardo@glickman-law.com to the persons at the e-mail address(es) listed on the attached Service List.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **October 1, 2020**, at Sherman Oaks, California.

/s/ Steven C. Glickman
Steven C. Glickman

SERVICE LIST

Lockett, et al. v. County of Los Angeles, et al.
2:18-cv-5838-PJW

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LOS ANGELES COUNTY
SHERIFF'S DEPARTMENT,
and SHERIFF JIM McDONNELL